

PREScribing PSYCHOLOGISTS' REGISTER INC.

The First and Oldest Training and Credentialing Organization for Psychologists in Psychopharmacology



Nov 26, 2010

Robert Kahane (Delivered and Faxed: Nov. 29, 2010)
Executive Officer,
California Board of Psychology
2005 Evergreen Street, Suite 1400
Sacramento, CA 95815
Tel. 916-263-2699 Fax: 916-263-2697

Re: Title 16, Division 13.1 Sections 1397.60-1397.71
Adopt sections: 1397.60, 1397.61, 1397.62, 1397.67,
1397.69, and 1397.70
Amend sections: 1397.60, 1397.61, 1397.62, 1397.63, 1397.64,
1397.65, 1397.66, 1397.67, 1397.68, 1397.69, 1397.70 and
1397.71

Dear Mr. Kahane:

The purpose of this re-petition/communication is to request information as to any Board action relative to PPR's petition brought before the Board as to the Board's apparent decision to omit PPR from inclusion as a C. E. Provider, as evident in the board's written proposed action for the hearing planned December 3rd, 2010; to formally request a copy of the tapes that were made at the Board meeting in which PPR's petition was indeed denied, and about which PPR did not receive any notice. PPR will pay all costs for these copies, to formally object to the current proposed changes for the reasons that follow in this communication, and to request that additional local and national C. E. Providers, including PPR, be re-considered for inclusion in the proposed new rules and regulations of the Board's planned hearing on December 3rd 2010.

PPR is also individually requesting that the Board favorably review PPR's original petition along with the new information presented in this communication as stated below, for the Board to include PPR as one of the national organizations accepted as Continuing Education Providers under the new rules the Board is now planning to establish.

PPR formally protests the seemingly arbitrary disenfranchising of MCEP Board approved Continuing Education Providers such as PPR, in favor of virtually one Provider for the entire state of California's approximately 20,000. Licensed Psychologists. PPR has received the Board's email dated October 14, 2010, informing PPR that only APA and its sponsors (and one medical profession CE organization, which has only a limited, small percentage of its courses covering any mental health subjects, with virtually no psychopharmacology training series of courses offered,) as being considered for acceptance to provide C. E. courses to the Board's licensees.

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U.S. CONGRESSMAN,
WILLIAM LEHMAN (Ret.)

Ironically, PPR is the only MCEP Approved Provider organization that offers a psychopharmacology and related sciences training Continuing Education Program that meets the Board's own published recommended curricula series of courses in Psychopharmacology for its licensees, and meets the criteria for formal approval by the APA to allow PPR's graduates to sit for the APA Psychopharmacology Examination for Psychologists (PEP), a national examination in Psychopharmacology.

By only accepting APA and its numerous C. E. "Sponsors" who are virtually unknown to the Board, and who must submit payments and fees only to APA, (with only perfunctorily including a medical profession C. E. entity with limited mental health courses,) the Board is heading in the direction of creating a virtual monopoly for APA and APA's legal California Affiliate/C. E. Sponsor, the California Psychological Association (CPA).

PPR believes that depositions taken for the inevitable court hearing or administrative hearing, will show numerous communications outside of the open and transparent operation of the Board as required by law, along with the absence of any written communications or documented criteria on which the Board might have relied on, in order to consider granting the APA and its Sponsors any such CE Provider status. PPR believes that conflict of interest and/or the appearance of such, (i.e. leaders of both the CPA and MCEP; the Board, APA, and CPA, etc.,) together with deliberate "Interference of a Business" violations and certain FTC and Sherman Anti-Trust legal issues, may well become evident in such depositions. (See enclosures.)

In a communication to PPR from the Board, some years back, the Board's ED at that time, stated in writing, that there were no documents on record regarding the APA CE program, (nor of ABPP's or CPA's.) (The same Board attorney served at that time as she does now.) PPR has reason to believe that the Board has not obtained such needed information as of the date of this communication, and therefore the Board has no objective basis to accept those organizations as C. E. Providers. If PPR's belief is incorrect, please send PPR a copy of such documentation, for which we will gladly pay all costs.

It is for the above stated reasons that PPR formally objects to the Board's severe limitation of Approved C. E. providers in its new proposed rules, and requests that all current MCEP/Board Approved C. E. Providers be included alongside of APA as accepted Providers of Continuing Education. PPR, as a national organization for over 19 years, and as the psychology profession's pioneer in Psychopharmacology Training Programs, and as the major, if not only supplier of MCEP Approved C. E. series of Psychopharmacology Training Courses, certainly should be included in the Board's new proposed rules.

PPR requests that its previous petition be reviewed again, in light of the above additional information regarding its MCEP Approved Psychopharmacology Training Program Series of Courses, and the Board's committed recommendation for such Psychopharmacology training.

It is also requested (as in the beginning of this communication), that PPR receive notice of the disposition of the Board's initial review and action taken on PPR's Petition, since to date, we have had no communication from the Board regarding any such action taken by the Board relative to its rejection of PPR's original recent petition. Was a motion made? Was a vote taken? Was an audio recording made?

PPR formally requests that this written communication, which may or may not personally affect certain present or past members of the Board, be distributed to at least the current Board members before the start of the December 3rd hearing, so that the Board members are directly aware of PPR's new concerns and requests.

Please inform PPR if this member distribution request will be completed at least one day before the hearing, in order to allow all Board members appropriate time to consider PPR's requests and new petition. I understand that a majority of the Board members are relatively newly appointed, and will need some time before the hearing, to digest these important issues, which the Board's deadline for submission is established as today.

If you need any additional information, or intend to respond to this communication, please be aware that PPR has since changed attorneys, and we request direct communication pending our new law firm's inclusion in these specific matters, pending the Board's response, be communicated directly to me as PPR President.

Thank you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Samuel A. Feldman", followed by the word "President" in a similar script.

Samuel A. Feldman, Ph.D., FICPPM, FSMI, FSICPP
Encls. PC: Selected PPR members, PPR legal council, Current Calif. Board's legal council, Mr. Jerry Brown, current AG, Gov.-elect, and Linda Kassis, rule proposal contact person